



FRIENDS OF THE CLEARWATER

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Barry Ruklic, Team Leader
Nez Perce-Clearwater National Forest Office
104 Airport Road
Grangeville, Idaho 83530

Sent via Email to comments-northern-nezperce-salmon-river@fs.fed.us

Dear Mr. Ruklic:

The following comments on the Hungry Ridge scoping letter are on behalf of Friends of the Clearwater and the Alliance for the Wild Rockies. There are several serious problems with the proposal and the scoping letter.

NEPA/Purpose and Need/DFCs

An EIS must be prepared. The size of the project, the scope (including logging in TES species habitat, logging in roadless areas, the fact that this project alleges recover for activities which normally cause degradation, and the fact that the agency's assumptions about fire and fire risk are scientifically suspect all show an EIS is needed.

Further, the EIS must clearly explain why the DFCs for this project are different than those in the Forest Plan. This is a serious question of compliance with both NEPA and NFMA. Indeed, desired future conditions (DFCs) of all major resources must be specifically defined with timelines for achievement. A specific description how these DFCs will be integrated must be provided.

The purpose and need (resilience, WUI) need to be scrutinized in the EIS. Merely stating these desires, without sound data, is inadequate. The EIS needs to analyze a range of alternatives and the purpose and need can't be so narrow as to preclude full consideration of a range of alternatives.

Give the past logging and recently approved projects in the area, cumulative impacts and connected actions must be properly evaluated.

Wildlife/Watershed/Soil/Fisheries Issues

We have some concerns that need to be addressed:

- A scientifically credible analysis of cumulative effects on the South Fork of the Clearwater River needs to be done. NEZSED is not adequate because it does not model mass erosion exceeding ten cubic yards of sediment. Other models, including WEPP, could be used. The analysis should include the cumulative impacts from the Hungry Ridge development program and other major timber projects capable of impacting the South Fork. Cumulative impact analyses should also be conducted for Johns and Mill Creeks.
- The use of outdated data and information on fish, wildlife and watershed resources are not acceptable. Assessments based on “stale” data (>three years) are not credible. Protocols need to be consistent to determine trend. Currently, the Forest Service has fallen far short of its monitoring requirements. We don’t see how a decision can be made by 2015 given the lack of required Forest Plan monitoring.
- PACFISH and INFISH riparian guidelines must be used, at a minimum, for riparian management. A map displaying all PACFISH/INFISH buffers and their functional status should be provided. Activities within mass erosion land types should contain buffers capable of stopping or minimizing landslides, which would be far larger than normal PACFISH/INFISH buffers. For example, there are cutting units planned for steep slopes in Johns Creek. These must be dropped. No roads should be constructed within these buffers either. In essence, land types characterized by mass erosion risk should not be roaded or logged.
- Funding for salmon/steelhead recovery (PA or Biological Opinion money) can’t be used to decommission old logging roads and mitigate sediment impacts from the project. BPA and the Northwest Power Council use this mitigation in order to meet their requirements under the Biological Opinion. The Forest Service needs to fund their own road obliteration program.
- The project must comply with the Endangered Species listings for steelhead, bull trout and fall Chinook salmon. Critical habitat for these listed species should not be degraded. The logging proposed that goes down to the border of Johns Creek, a prime bull trout stream, should not occur.
- This project must comply with all Forest Plan standards and objectives for fish, wildlife, and watershed resources.
- The best available science (not outdated or inaccurate versions) should be used for the analyses and modeling. This specifically applies to analyses of watershed, fish and wildlife impacts.
- A scientifically credible analysis of Upward Trend Compliance for Johns Creek, Mill Creek, and the South Fork of the Clearwater River must be presented (Nez Perce Forest Plan, 1987). The Forest Service has had plenty of time to monitor and display a statistically valid trend of recovery.
- A timeline for decommissioning temporary roads must be provided.
- Adequate habitat for old growth-dependent species must be provided.
- Adequate habitat for all sensitive fish and wildlife species must be provided.

- A description of the management context of this proposal in relation to other E-1 management areas of the Nez Perce-Clearwater Forest and within a time period of 15-20 years should be provided. How many similar timber projects will be proposed during this time period and where?
- The EIS must analyze impacts to threatened endangered and sensitive terrestrial species, including but not limited to lynx, fisher, grizzly (the Bitterroot Recovery Area), and wolverine.
- Credible evidence that the Forest Service has been successful in creating more resilient and diverse forest structures on the Nez Perce National Forest with large logging projects like this must be presented. Further, the Forest Service must demonstrate that this type of massive logging has resulted in recovery of watersheds to meet all Forest Plan fish and water standards (including Appendix A).
- The EIS must show how logging old growth (prohibited in the Forest Plan) will result in better protection for old growth. Logging old growth to improve old growth characteristics is scientifically controversial and suspect.

Wilderness/Roadless/Wild and Scenic Rivers Issues

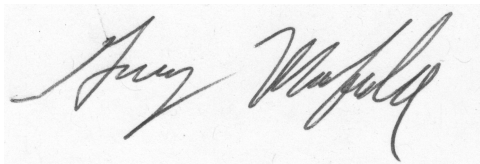
The EIS must evaluate the impacts to the Gospel Hump Wilderness from the proposal. Logging would occur right up to the boundary, as proposed in the scoping letter map.

The EIS must evaluate the impacts to roadless land contiguous to the Gospel Hump Wilderness. The fact that the Forest Service incorrectly refused to recognize these roadless areas in the Idaho Roadless Rule or elsewhere does not excuse the agency from analysis in an EIS.

The EIS must analyze impacts to eligible wild and scenic rivers from the proposal.

Please keep us updated on this proposal.

Sincerely,



Gary Macfarlane
Friends of the Clearwater

--and for--
Alliance for the Wild Rockies